



# California Regional Water Quality Control Board

## Santa Ana Region

KS/AES

A



**Terry Tamminen**  
Secretary for  
Environmental  
Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348  
(909) 782-4130 • Fax (909) 781-6288  
<http://www.swrcb.ca.gov/rwqcb8>

**Arnold Schwarzenegger**  
Governor

March 5, 2004

Mr. Tad Trout  
American Promotional Events, Inc. – West  
555 North Gilbert Street  
Fullerton, CA 92833-2508

**REVIEW OF PERCHLORATE SUPPLEMENTAL INVESTIGATION REPORT, AMERICAN PROMOTIONAL EVENTS, INC. – WEST FACILITY, 3196 NORTH LOCUST AVENUE, RIALTO, SAN BERNARDINO COUNTY**

Dear Mr. Trout:

Board staff has reviewed the January 6, 2004 submittal from PES entitled "Supplemental Perchlorate Investigation Report for American Promotional Events – West, Inc., 3196 North Locust Avenue, Rialto, California. This investigation report was prepared by your consultant, PES Environmental (PES), and submitted in response to the requirements of the Investigation Order that I sent to you on September 25, 2002.

The objective of the supplemental investigation was to further assess the lateral and vertical extent of perchlorate in the soil beneath the former burn area. Previous soil sampling in this area detected perchlorate in two samples (T14-2.0 and T14-8.0) at concentrations of 2.9 milligrams per kilogram (mg/kg) and 0.29 mg/kg, respectively. Samples T14-2.0 and T14-8.0 were collected from trench T14, excavated beneath the former burn unit area, at depths of two and eight feet below ground surface (bgs), respectively.

In order to accomplish the objective of this investigation, one trench (T16) was completed immediately adjacent to the previously sampled trench (T14). As requested by Board staff, the trench was excavated in the shape of an "L", along the northern and eastern edges of the former trench (T14). Soil samples were collected from four locations (T16A, T16B, T16C and T16D) along the centerline of the trench, approximately three feet on center. Soil samples were collected from each of the four locations at approximately two and eight feet bgs.

Prior to trenching activities, the concrete slab foundation overlying the trenching area was cut using a portable saw. The trench was excavated to a total depth of eight and one-half feet bgs, using a track-mounted mini-excavator. Samples collected from two feet bgs were collected directly from in-place soil along the bottom centerline of the trench, from locations approximately three feet equidistant on center. Samples collected from eight feet bgs were collected directly from excavated soil in the backhoe bucket. Sampled materials consisted of medium to smaller grained sand. Chemical analyses for soil samples collected during the site investigation were performed by a state-certified analytical laboratory. Soil samples were analyzed for the presence of perchlorate, using USEPA Method 314.

**California Environmental Protection Agency**

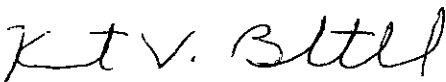
Based on the analytical data for nine soil samples (eight primaries and one duplicate), perchlorate was detected in four soil samples that were collected from two of the four locations (T16C and T16D). In the samples collected from location T16C, perchlorate was detected at concentrations of 0.34 mg/kg (T16C-2.0), collected from two feet bgs, and 0.079 mg/kg (T16C-8.0), collected from eight feet bgs. Perchlorate was detected in the samples collected from location T16D at concentrations of 0.49 mg/kg (T16D-2.0), collected from two feet bgs, and 0.21 mg/kg (T16D-8.0), collected from eight feet bgs. Perchlorate was not detected at or above the laboratory-reporting limit (0.04 mg/kg) in any of the other samples.

Based on our review of the analytical data for soil samples collected from trench excavation T16, it is evident that there was some perchlorate released to soil at the APE site. However, the concentrations at which perchlorate was detected in trench T16, and the absence of perchlorate from the soil in other areas of the site, suggest that the perchlorate release to soil at the APE site is of a limited extent. Therefore, we believe that no additional soil investigation by APE is necessary at this time.

Additional soil investigations by former facility operators and property owners have been scheduled for the upcoming weeks for this site. Pending the results of these investigations, Board staff may require former and present facility operators and property owners to prepare a work plan for installation of groundwater monitoring wells in specific areas of the site, including the former burn area at APE. At that time, APE and others may be requested to perform the necessary field work or to financially contribute toward the implementation of groundwater investigation or remediation.

If you have any questions, please contact Kamron Saremi at (909) 782-4303, or you may call Ann Sturdivant, Chief of our Spills, Leaks, Investigations and Cleanups Section, at (909) 782-4904.

Sincerely,



for Gerard J. Thibeault  
Executive Officer

cc: Jorge Leon, SWRCB, Office of Chief Counsel  
Carl Michelsen, PES Environmental, Inc.  
Daniel Coyle, Downey Brand Seymour & Rohwer, LLP  
Inland Empire Perchlorate Regulatory Task Force members (mailing list attached)

KS: Rialto perchlorate/13267/APEcommentltr

The Honorable Senator Nell Soto  
State Capital, Room 4078 P.O. Box 942848  
Sacramento, CA 94248-0001

Anthony Araiza, Jerry Eagans & Leon Long  
West Valley Water District  
P.O. Box 920  
Rialto, CA 92377-0920

Barry Groveman & Steven Elie  
Musick, Peeler & Garrett  
624 S. Grand Ave., Suite 2000  
Los Angeles, CA 90017-3383

Christine Brown, Karen Baker Wendy Arano, & Aaron Yue  
California Dept. of Toxic Substances Control  
Geology & Corrective Action Branch  
5796 Corporate Ave.  
Cypress, CA 90630

Eric Fraser  
City of Colton  
Public Utilities Department  
650 N. La Cadena Drive  
Colton, CA 92324-2897

Francis D. Logan, Jr. & Susan M. Trager  
Law Offices of Susan M. Trager  
19712 MacArthur Blvd., Ste. 120  
Irvine, CA 92612

Gary Tavetian, Kate Kennedy  
California Office of the Attorney General  
300 S. Spring St., Ste. 500 N.  
Los Angeles, CA 90013-1204

Gene Tanaka, Danielle Sakai  
Best, Best & Kreiger  
3750 University Ave., Mission Square  
Riverside, CA 92501

Glen Yabuno & Ken Ayers  
County of San Bernardino  
Specialized Prosecutions Unit  
412 W. Hospitality Lane, Ste. 301  
San Bernardino, CA 92415-0023

Mike Bledsoe, Michael Wochnick  
California Integrated Waste Management Board  
P.O. Box 4025  
Sacramento, CA 95812-4025

Mike Whitehead/Mike McGraw/ Jim Bryson/Gerald J. Black  
Fontana Water Company  
P.O. Box 987  
Fontana, CA 92335

Peter Fox & Robert Owen  
City of Rialto  
Public Works Department  
150 S. Palm Avenue  
Rialto, CA 92376

Robert Thompson  
Thirty-second Senatorial District  
Office of Senator Nell Soto  
822 N. Euclid Ave., Suite A  
Ontario, CA 91762

Sarah Mueller, Wayne Praskins & Matt Mitguard  
U.S. EPA - Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Tim Ryan & Robert Young  
San Gabriel Valley Water Company  
Fontana Water Company  
11142 E. Garvey Ave.  
El Monte, CA 91732**

**Tom Soto  
PS Enterprises  
3350 Ocean Park Blvd., Ste. 205  
Santa Monica, CA 92405**